

UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Arlond Joseph Jenkins, IV	:	Chapter 13
		:	
	<u>Debtor</u>	:	
Santander Consumer USA INC.		:	
Movant		:	Bankruptcy Case Number
		:	18-13206 MDC
		:	
v.		:	
		:	
Arlond Joseph Jenkins, IV		:	
		:	
Respondent/Debtor		:	
		:	
And		:	
		:	
William C. Miller, Esquire		:	
Trustee		:	

**Debtor's Response to the Motion of Santander Consumer USA, Inc.
for Relief from the Automatic Stay**

Debtor, Arlond Joseph Jenkins, IV, by and through his counsel, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this response to the Motion for Relief of Santander Consumer USA, Inc. and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. ADMITTED.
5. ADMITTED.
6. DENIED. Answering Debtor denies the allegations contained in this paragraph as

conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

7. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

WHEREFORE, Debtor, Arlond Joseph Jenkins, IV, requests this Honorable Court deny the motion of Santander Consumer USA, INC for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

\s\ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Attorney for Debtor